## **EXHIBIT 5**

### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case

#### This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977 Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849 Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978 Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al., No. 04 Civ. 1923 Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970 Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065 Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279

PLAINTIFFS' FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA

THE MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES August 22, 2013

#### PLAINTIFFS' FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA

Plaintiffs in Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977, Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03 Civ. 9849, Federal Insurance Co., et al. v. al Qaida, et al., Case No. 03 Civ. 6978, Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al., Case No. 04 Civ. 1923, Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04 Civ. 5970, Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., Case No. 04 Civ. 7065, and Euro Brokers Inc., et al., v. Al Baraka, et al., Case No. 04 Civ. 7279, propound and serve on the World Assembly of Muslim Youth-Saudi Arabia (hereinafter "Defendant" or "WAMY"), the following Fourth Set of Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First, Second, and Third Sets of Requests for Production of Documents directed to the World Assembly of Muslim Youth-Saudi Arabia are incorporated herein by reference, except the following definition shall also apply:

1. The terms "WAMY," "Defendant," "You," and "Your" shall refer to the World Assembly of Muslim Youth-Saudi Arabia and any branch office, subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer, or representative acting on the World Assembly of Muslim Youth-Saudi Arabia's behalf and/or at its direction.

# PLAINTIFFS' FOURTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA

1. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between WAMY and Abdullah Omar Naseef and Abdullah al Turki (hereinafter collectively referred to as the "Charity Officials"), including without limitation, all documents relating to all positions the Charity Officials held or hold within WAMY. Responsive documents shall include, but are not limited to, their personnel or employment files.

#### **ANSWER:**

2. Please provide all documents relating to any notification received by any of the Charity Officials of any alleged involvement of any branch office, official, employee, or representative of WAMY in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

#### **ANSWER:**

3. Please provide all documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged involvement of any branch office, official, employee, or representative of WAMY in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

#### **ANSWER:**

4. Please provide all documents relating to any notification received by any of the Charity Officials of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of WAMY.

#### **ANSWER:**

5. Please provide all documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of WAMY.

#### **ANSWER:**

6. Please provide all documents relating to any allegation that any of the Charity Officials were involved in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

#### **ANSWER:**

7. Please provide all documents relating to any meeting between any of the Charity Officials and any representative of the Saudi government or any foreign government.

#### **ANSWER:**

ANSWER:	
Officials and any representative of any separatist or independence movement or organization.	
8.	Please provide all documents relating to any meeting between any of the Charity

Respectfully submitted,

Dated: August 22, 2013

BY: THE MDL 1570 PLAINTIFFS: EXECUTIVE COMMITTEES

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Plaintiffs' Fourth Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia was served via electronic mail and U.S. first-class mail, postage prepaid, this 22<sup>nd</sup> day of August 2013, upon:

Omar T. Mohammedi, Esq. Law Firm of Omar T. Mohammedi, LLC Woolworth Building 233 Broadway, Suite 801 New York, New York 10279

> Alan R. Kabat, Esq. Bernabei & Wachtel, PLLC 1775 T Street, N.W. Washington, D.C. 20009-7102

(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

J. Scott Tarbutton, Esq.

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